

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-224 (NEB/DTS)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	GOVERNMENT'S POSITION
v.)	REGARDING SENTENCING
)	
SAHRA MOHAMED NUR,)	
)	
Defendant.)	


The United States of America, by and through its attorneys, Lisa D. Kirkpatrick, Acting United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Matthew S. Ebert, and Daniel W. Bobier, Assistant United States Attorneys, submits the following sentencing memorandum and respectfully requests that the Court impose a sentence of 60 months in prison.

I. BACKGROUND

A. The Fraudulent S & S Catering Food Sites

Nur, along with her co-defendant Qamar Hassan, owned and operated S & S Catering. S & S Catering existed prior to the Covid-19 pandemic as a small catering establishment that prepared meals for modest gatherings or small daycare centers participating in the federal child nutrition program. With the onset of the pandemic, S & S Catering emerged as a major participant in defrauding the federal child nutrition program. Beginning in 2020, the volume of their reimbursements through Feeding Our Future dramatically increased.

S & S Catering claimed to participate in the federal child nutrition program in two ways. First, Nur enrolled S & S Catering as a site participating in the program under the sponsorship of Feeding Our Future. After enrolling as a site, S & S Catering falsely claimed to almost immediately serve over 2,500 meals to children daily from their small, storefront catering restaurant on Lake Street in Minneapolis. Nur and her other co-conspirators submitted fake meal counts claiming to serve meals to thousands of kids per day.


FEEDING OUR FUTURE

SUMMER MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	aimee@feedingourfuturemn.org		Phone	612.345.4922	
Site	S&S		Supervisor			Week of	9/27/20	
Meal Type	BREAKFAST		<input checked="" type="checkbox"/> LUNCH		<input checked="" type="checkbox"/> SUPPER			
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared					2518	2521	2510	7549
Number of meals from yesterday					0	0	0	0
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children					2500	2500	2500	7500
Number of second meals served to children (not reimbursed)					0	0	0	0
Number of meals served to program adults (not reimbursed)					9	12	6	27
Number of meals served to non-program adults (not reimbursed)					7	6	2	15
Number of children requesting meals of food is gone					60	58	55	173
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE					157°F	160°F	151°F	
Number of non reimbursable, incomplete or damaged meals					2	3	2	7
Number of leftover meals					0	0	0	0
Initials of person taking daily meal count certifying that the information is true and accurate					PH	PH	PH	PH
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature	Damartha				Date	10/3/2020		

In total, S & S Catering claimed to serve over 1.2 million meals to children as a food site participating in the federal child nutrition program. Nur and S & S catering received over \$6.8 million in federal funds based on their fraudulent claims.

B. S & S Catering's Acted as a Fraudulent Vendor for Other Sites

S & S Catering was a for profit catering business. Eventually, after MDE banned the participation of for-profit entities in the federal child nutrition program, S & S Catering returned as a purported "vendor" in the program. Nur and S & S Catering claimed that it was acting as a vendor, providing meals to other sites participating in the federal child nutrition program. As a vendor, S & S Catering claimed to provide a staggering number of meals to other participating sites. But in reality, nearly all of these sites were related to S & S Catering, which provided only a fraction of the food.

For example, S & S Catering acted as a purported vendor for a supposed non-profit called Youth Higher Educational Achievement. But that entity was created by Qamar Hassan's daughter, co-defendant Filsan Hassan. The entity was not a real non-profit, but instead was created for the sole purpose of enrolling as a site for which S & S Catering would act as the vendor. Youth Higher Educational Achievement submitted its own claims to Feeding Our Future, falsely claiming to serve nearly 5,000 meals to children each day. It also submitted invoices claiming that S & S Catering was the vendor preparing these fake meals and entitled to millions of dollars in fraudulent reimbursements.

S&S Catering Inc					
307 E Lake St			Phone:612-987-3977		
Minneapolis, MN 55408					
Bill To:	YOUTHFOR HIGHER EDUCATIONAL ACHEIVEMENTS		Phone:65 612-707-0922	Invoice #:1019	
Address:				Invoice Date:4/30/21	
Invoice For:	4/1/2021 - 4/30/2021				
Date	Description	Food Description	Qty	Unit Price	Price
4/1/2021	Supper	Chicken Legs, Apples, Carrots, Knorr Rice Sides, Milk 1 %	4388	\$ 3.00	\$ 13,164.00
4/1/2021	Snack	Cheerios WGR Milk 1%	4388	\$ 0.80	\$ 3,510.40
4/2/2021	Supper	Dried Red Beans, Bananas, Green Peppers,Rice A Roni, Milk 1%	4388	\$ 3.00	\$ 13,164.00
4/2/2021	Snack	Goldfish Milk 1%	4388	\$ 0.80	\$ 3,510.40

Sahra Nur also established her own fake non-profit, Academy for Youth Excellence, that she and her co-defendants used to fraudulently participate in the federal child nutrition program. Nur helped register the non-profit entity with the Secretary of State and sent the documents to Aimee Bock to enroll as a site.

Academy for youth excellence	
From:	Sahra Nur <sahrajisow@gmail.com>
To:	aimee@feedingourfuturemn.org
Date:	Wed, 02 Dec 2020 15:29:28 -0600
Attachments:	ACADEMY FOR YOUTH EXCELLENCE.pdf (1.24 MB)

Academy for Youth Excellence claimed to run a site out of Benadir Hall, a banquet center above the S & S Catering location that was purchased entirely with proceeds of this fraud. From that location, Nur and her co-defendants claimed to serve as many as 5,000 meals to children per day, starting almost immediately after the

site applied to participate in the program. Nur personally signed and submitted the fake meal count claims directly to Aimee Bock at Feeding Our Future.

Academy for youth excellence

From: Sahra Nur <academyforyouthexcellence@gmail.com>
To: aimee@feedingourfuturemn.org
Date: Wed, 06 Jan 2021 16:22:20 -0600
Attachments: Academy for youth excellence DEC 23 - 31.pdf (4.42 MB)



FEEDING OUR FUTURE

SUMMER MEAL COUNTS – CLICKER

Sponsor	FEEDING OUR FUTURE		Email	aimee@feedingourfuturemn.org		Phone	612.345.4922	
Site	ACADEMY FOR YOUTH EXCELLENCE		Supervisor			Week of	12/20/20	
Meal Type	BREAKFAST			X		LUNCH		
Available Meals	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of meals received/prepared				2492	2483	2500	2500	9975
Number of meals from yesterday				0	0	0	0	0
Meal Counts	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
Number of firsts served to children				2492	2483	2500	2500	9975
Number of second meals served to children (not reimbursed)				0	0	0	0	0
Number of meals served to program adults (not reimbursed)				0	0	0	0	0
Number of meals served to non-program adults (not reimbursed)				0	0	0	0	0
Number of children requesting meals of food is gone				0	0	0	0	0
Food	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	TOTAL
FOOD TEMPERATURE				N/A	N/A	N/A	N/A	N/A
Number of non-reimbursable, incomplete or damaged meals				0	0	0	0	0
Number of leftover meals				0	0	0	0	0
Initials of person taking daily meal count certifying that the information is true and accurate				SN	SN	SN	SN	SN
SITE SUPERVISOR: By signing, I certify that the above information is true and accurate.								
Signature	SAHRA M NUR					Date	12/26/20	

Nur then provided invoices from her fake non-profit, Academy for Youth Excellence, to S & S Catering for purportedly providing the meals. In total, Academy for Youth Excellence claimed to have served more than 1.7 meals and received more than \$4.2 million dollars—just from that one site.

In total, as a vendor, S & S Catering claimed to provide more than 8 million meals to other sites. S & S Catering received more than \$12 million in federal child nutrition program funds based on these false claims.

C. S & S Catering Fake Attendance Rosters

In addition to the fake meal counts, Sahra Nur and her co-defendants created and submitted fraudulent attendance rosters in support of their fraudulent claims. These rosters purported to list the names of children who received free food at the various sites operated or vended by S & S Catering. A comparison of those rosters to the full list of schools attending school in the local school district seems to show that most, if not all, of the names were fake. In addition, several of the rosters contained a trail demonstrating where the fake names were created. For example, one roster submitted in support of Youth Higher Educational Achievement claims contained an embedded link to a website called www.listofrandomnames.com--which as the name suggests, has a function to create random names. In this case, the names generated by the website were submitted as the names of students purportedly being served meals made by S & S Catering.

D. Sahra Nur Used the Fraud Proceeds to Fund Her Lifestyle

Sahra Nur made millions of dollars by falsely claiming to serve meals to children. She used this money to fund a lavish lifestyle. In particular, Nur spent millions of dollars of real estate. She used the fraud proceeds to purchase multi-million-dollar investment properties through the Twins Cities. She and her co-defendants established Golis Properties and Kilimanjaro Properties, which invested their fraud proceeds (more than \$3.3 million total received from S & S Catering). These entities purchased two commercial buildings and a residential property. She also purchased an apartment in Nairobi, Kenya. All with the proceeds of the fraud.

II. THE GUIDELINES RANGE

A. The Base Offense Level and Loss Amount

The base offense level is 6 pursuant to Guidelines § 2B1.1(a)(2). PSR ¶56. The base offense level is increased 20 levels pursuant to Guidelines § 2B1.1(1)(K) because the loss was more than \$9.5 million but less than \$25 million. PSR ¶57. The government is not seeking offense level enhancements under Guidelines §§ 2B1.1(b)(9)(A) or 2B1.1(b)(12) because those enhancements were not contemplated in the plea agreement. PSR at A.1-A.2. The offense level is reduced 2 levels pursuant to Guidelines § 4C1.1(a) because Nur meets the criteria of a zero-point offender. PSR ¶71. The offense level is reduced 3 levels pursuant to Guidelines § 3E1.1(a) and (b) because Nur accepted responsibility in a timely manner. PSR ¶¶72-73.

B. Criminal History

Nur has no criminal history and falls in criminal history category I. PSR ¶79.

III. GOVERNMENT'S SENTENCING RECOMMENDATION

Based on a review of the § 3553(a) factors, the government asks the Court impose a sentence of 60 months in prison.

Nur participated in one of the largest fraud schemes in the history of the District of Minnesota, and the single largest Covid-19 fraud scheme in the country. She took advantage of a once-in-a-century global pandemic to enrich herself. She abused and took advantage of a child nutrition program designed to ensure that no child goes without food. The cynicism of her crime is staggering. Her crime has eroded trust in the government and raised questions about the sustainability of our state government. Her crime undermined and endangered legitimate nonprofit organizations that rely on donations to carry out actual charitable work.

In recent years, Minnesota has been plagued by unprecedented levels of fraud—the likes of which are not seen elsewhere around the country. But fraud is a choice. Nur did not act out of financial hardship or need. She acted out of sheer greed. And she did so, presumably, because she thought she could get away with it.

This Court must send a message that fraud of this nature is no longer acceptable in Minnesota.

Taking into consideration the Sentencing Guidelines, as well as all of the other factors required to be considered under § 3553(a), the government respectfully suggests that a sentence of 60 months in prison appropriately reflects the seriousness of her crime, promotes respect for the law, provides a just punishment, and creates adequate deterrence not only to Nur, but to all other individuals who take advantage of the state and believe that they are above the law.

IV. CONCLUSION

For the reasons stated above, the government respectfully requests that the Court impose a sentence of 60 months in prison.

Respectfully Submitted,

Dated: March 31, 2025

LISA D. KIRKPATRICK
Acting United States Attorney

/s/ Harry M. Jacobs
BY: JOSEPH H. THOMPSON
HARRY M. JACOBS
MATTHEW S. EBERT
DANIEL W. BOBIER
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